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Idaho State Bar #3436

DISTRICT COURT  
Fifth Judicial District  
County of Twin Falls - State of Idaho

MAR 05 2001

By \_\_\_\_\_ Clerk  
\_\_\_\_\_  
Deputy Clerk

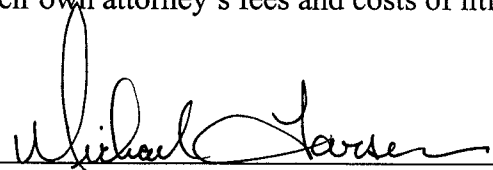
**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

STATE OF IDAHO, Department	)	
of Finance,	)	
	)	Civil No. CV -00-1784
Plaintiff,	)	
	)	<b>STIPULATION FOR</b>
vs.	)	<b>JUDGMENT AND</b>
	)	<b>PERMANENT INJUNCTION</b>
AGRICULTURAL SERVICES OF AMERICA,	)	
INC., a Wyoming corporation;	)	
AGRICULTURAL INVESTMENTS OF	)	
AMERICA, INC., a Wyoming corporation;	)	
GREGORY S. DABNEY; RUSSELL R.	)	
GRAHAM; and PAUL GRANT,	)	
	)	
Defendants.	)	
_____	)	

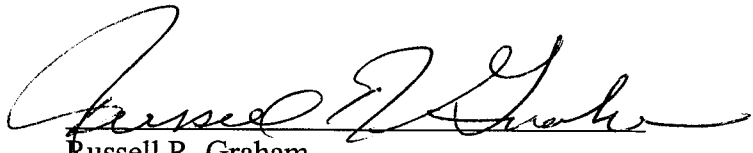
COMES NOW the Plaintiff, by and through counsel, and Defendant Russell R. Graham,  
by and through counsel, in order to avoid prolonged litigation, to stipulate and agree as follows:

1. The Complaint on file herein states a cause of action for injunctive relief against Defendant Russell R. Graham.
2. Defendant Russell R. Graham neither admits nor denies the violations alleged in the Complaint.
3. Defendant Russell R. Graham agrees that the Judgment and Permanent Injunction attached hereto as "Exhibit A" may be entered against him, and he hereby consents to the entry thereof.
4. Said Judgment and Permanent Injunction shall constitute a final resolution of all issues presented in Plaintiff's Complaint as to Defendant Russell R. Graham, and may be presented to the Court immediately or at any time convenient to the Court, without the necessity of findings of fact or conclusions of law or further pleadings or proceedings in this matter.
5. All stipulating parties shall bear their own attorney's fees and costs of litigation.


3-1-01  
Date

  
\_\_\_\_\_  
Michael Larsen  
Deputy Attorney General  
Counsel for Plaintiff  
State of Idaho, Department of Finance

Feb 28, 2001  
Date

  
\_\_\_\_\_  
Russell R. Graham

3/1/01  
Date

  
\_\_\_\_\_  
William J. Batt  
Counsel for Defendant Russell R. Graham

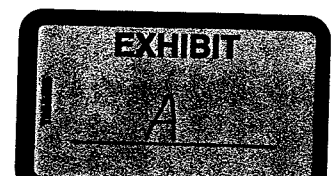
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**OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

STATE OF IDAHO, Department	)	
of Finance,	)	
	)	Civil No. CV -00-1784
Plaintiff,	)	
	)	
vs.	)	<b>JUDGMENT AND</b>
	)	<b>PERMANENT INJUNCTION</b>
AGRICULTURAL SERVICES OF AMERICA,	)	
INC., a Wyoming corporation;	)	
AGRICULTURAL INVESTMENTS OF	)	
AMERICA, INC., a Wyoming corporation;	)	
GREGORY S. DABNEY; RUSSELL R.	)	
GRAHAM; and PAUL GRANT,	)	
	)	
Defendants.	)	
	)	

It appearing to the Court that Defendant Russell R. Graham, in the Stipulation for Judgment and Permanent Injunction filed with the Court, has admitted that the Complaint states a cause of action for injunctive relief under the Idaho Securities Act and has agreed and consented



to the entry of judgment granting a permanent injunction against him, and has waived the necessity of findings of fact and conclusions of law with respect thereto, and the Court being fully advised in the premises:

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. Defendant Russell R. Graham is permanently enjoined from engaging in any acts, practices or omissions which would constitute violations of the Idaho Securities Act, and in particular, is permanently enjoined from:
  - A. Selling or offering for sale nonexempt securities in any form in the State of Idaho until such time as such securities have been registered with the Idaho Department of Finance, in accordance with Title 30, Chapter 14, Idaho Code;
  - B. Transacting securities business in the State of Idaho until such time as Defendant Russell R. Graham has become registered as a broker-dealer, or salesman for a broker-dealer or issuer, with the Idaho Department of Finance, in accordance with Title 30, Chapter 14, Idaho Code;
  - C. While engaged in or in connection with the offer, sale, or purchase of any security:
    - (1) Employing any device, scheme or artifice to defraud,
    - (2) Making any untrue statement of material fact, or omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading, and
    - (3) Engaging in any act, practice or course of business which operates or would operate as a fraud or deceit upon any person.

- D. Aiding, abetting, counseling, inducing or causing any other person to engage in any of the types of conduct described in paragraphs A, B, and C above.
2. Defendant Russell R. Graham is prohibited from claiming the availability of, using, or offering to sell securities under, any exemptions under the Idaho Securities Act without receiving the prior written consent of the Director.
3. Defendant Russell R. Graham shall restore to each person in interest any consideration which may have been acquired or transferred in violation of the Idaho Securities Act, and specifically but not limited to, the amounts and persons identified in the "Restitution Exhibit" attached hereto in the total amount of \$649,882.20.
4. This Judgment and Permanent Injunction shall serve as a final resolution of all issues presented in Plaintiff's Complaint as to Defendant Russell R. Graham.

DATED this \_\_\_\_ day of February 2001.

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Honorable Daniel B. Meehl  
District Judge

# RESTITUTION EXHIBIT

## ASA Shares Issued

Shareholders	Purchase date	Amount Invested
Larry or Kathy Adams	11/25/1997	\$10,000.00
AIA, Inc.		\$217,815.20
Dee Atkins	Unknown	Unk- Shares for Services
Robert & Judy Bertagna	6/11/1997	\$25,000.00
LeeAnn Bywater	Unknown	Unk- Shares for Services
Dolores J. Court	12/5/1997	\$2,500.00
Louie Jelichich or Dolores Court	12/5/1997	\$2,500.00
Val & Marie Court	12/17/1997	\$2,500.00
Dan & Jana Dibble	6/16/1997	\$19,285.00
Dan & Jana Dibble	6/16/1997	\$19,285.00
Dan & Jana Dibble	6/16/1997	\$19,285.00
Dan & Jana Dibble	6/16/1997	\$19,285.00
Farnsworth Heritage Trust	5/15/1997	\$19,285.00
David Gill Family Trust	5/16/1997	\$15,000.00
Steven Gill Family Trust	5/16/1997	\$15,000.00
Adam and Kimberlee Hanson	11/22/1997	\$5,000.00
Jonathan Hanson	11/24/1997	\$1,000.00
Reed and Etta Hanson	11/24/1997	\$4,000.00
Seth and Rebecca Hanson	12/2/1997	\$5,000.00
John Hatges	11/22/1997	\$5,000.00
Roy B. Hirsch Korn (Tasko)	Unknown	Unknown
Islesun, Ltd.	7/9/1997	\$11,000.00
Islesun, Ltd.	7/9/1997	\$11,000.00
Jerry R. & Kristine F. Jensen	5/16/1997	\$30,000.00
Robert R. or Karen A. Johnson	7/8/1997	\$21,000.00
L&M Christensen Foundation	7/5/1997	\$9,643.00
L&M Christensen Foundation	7/5/1997	\$9,643.00
John & Kathy Lee	12/19/1997	\$10,000.00
Robert A. & Rita L. Martin	5/16/1997	\$10,000.00
Grant & Lynn Maughan	5/21/1997	\$19,285.00
Peter P. McCann	5/15/1997	\$10,000.00
Louis K. and Susan M. Meyer	7/9/1997	\$10,000.00
Louis K. and Susan M. Meyer	7/9/1997	\$10,000.00
Lorraine Olzack	12/4/1997	\$2,500.00
Robert & Linda Olzack	12/4/1997	\$2,500.00
Ronald C. & Cynthia R. Parker	7/31/1997	\$9,643.00
Ronald C. & Cynthia R. Parker	7/31/1997	\$9,643.00
Clair Price	Unknown	Unk- Shares for Services
Nellie & Bernard Robbins	12/3/1997	\$5,000.00
Harry & Nancy Sands	7/1/1997	\$19,285.00
Martin and Lisa Shipley	7/18/1997	\$3,000.00
Stephanie Shull	Unknown	Unk- Shares for Services
James Fredrick & Susan Smith	12/17/1997	\$2,500.00
Brian and Karen Sullivan	7/18/1997	\$3,000.00
Michael and Susan Sullivan	7/18/1997	\$24,000.00
Lilia & Humberto Trujillo	2/5/1998	\$500.00
Totals		\$649,882.20

# AIA Shares Issued

Shareholders	Purchase Date	Amount Invested
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
1997 Gaul Family Revocable Trust	7/9/1997	\$100.00
William G. or Jalene C. Ainslie III	7/7/1997	\$250.00
Richard & Isabel Anderson	Unknown	Unknown
Cory A. or Malea Averett	7/21/1997	\$500.00
Benjamin L. or Rachel Babcock	7/8/1997	\$1,500.00
Brandon L. Babcock	7/10/1997	\$200.00
Nancy L. or Benjamin A. Babcock, Jr.	7/7/1997	\$3,500.00
Tricia L. Babcock	7/10/1997	\$200.00
Richard Robert Baker	7/11/1997	\$2,500.00
Richard J. and Teri Beardall	7/10/1997	\$500.00
Vicky Lynn Benenati	7/28/1997	\$1,500.00
Robert and Judy Bertagna	7/3/1997	\$10,000.00
Gerald S. and Julie A. Bertoni	7/25/1997	\$2,200.00
Josh Black	7/7/1997	\$100.00
Nancy Black	7/7/1997	\$450.00
John Walter Boere	6/27/1997	\$1,000.00
Carol Bowman and Mark Romero	7/23/1997	\$1,000.00
Rebecca Grant Brailsford	8/1/1997	\$5,000.00
Aleen Brown	6/16/1997	\$500.00
Cassidy Brown or Sandy Smith-Brown	7/26/1997	\$2,250.00
Darren Brown	6/16/1997	\$45.00
Quenton Brown	6/16/1997	\$25.00
Mary B. Bush	7/6/1997	\$500.00
David & Susan Byron	Unknown	Unknown
Brent D. or Donna L. Bywater	7/28/1997	\$100.00
C. Dewayne or Louise Bywater	7/12/1997	\$150.00
C. Dewayne or Louise Bywater	7/12/1997	\$150.00
Leann D. & Kurt W. Bywater	5/19/1997	\$1,100.00
Cal Enterprises, Ltd	7/10/1997	\$1,000.00
Cal Enterprises, Ltd	7/10/1997	\$1,000.00
Cal Enterprises, Ltd	7/10/1997	\$1,000.00
Cal Enterprises, Ltd	7/10/1997	\$1,000.00
Cal Enterprises, Ltd	7/10/1997	\$1,000.00
Vaughn E. Casdorff	6/26/1997	\$100.00
Robert or Many Chaney	7/23/1997	\$1,000.00
Rodney A. or Shelle M. Court	7/18/1997	\$1,000.00
Val or Marie Court	7/10/1997	\$500.00
Bryan W. or Angela L. Dabney	7/3/1997	\$2,500.00

Daniel or Stacy Dabney	6/11/1997	\$500.00
Ward or Olivia Dabney	6/10/1997	\$1,000.00
Ward or Olivia Dabney	7/11/1997	\$500.00
Ward or Olivia Dabney	7/11/1997	\$500.00
Ward or Olivia Dabney	7/11/1997	\$500.00
Kari Dalton	5/12/1997	\$125.00
Kari Dalton	9/30/1997	\$125.00
Andrew W. or Barbara Derrick	7/23/1997	\$5,000.00
Vivian Derrick	7/23/1997	\$5,000.00
Jay Edward Dulac	7/23/1997	\$5,500.00
Patricia and Frank Espinosa	7/21/1997	\$1,000.00
Brian L. Graybill	7/10/1997	\$2,000.00
Stephen and Angelica Guzman	7/4/1997	\$500.00
Stephen and Angelica Guzman	7/21/1997	\$500.00
Stephen and Angelica Guzman	7/21/1997	\$2,000.00
Robert B. Hansen	7/14/1997	\$3,500.00
Robert B. Hansen	7/24/1997	\$2,000.00
Rollayne Hansen	7/18/1997	\$5,100.00
Kelly S. and Teresa Haux	7/29/1997	\$150.00
Dan Hawker	7/25/1997	\$2,000.00
Brent M. or Jan C. Hyatt	7/29/1997	\$9,595.00
Tina or William G. Johnson	7/15/1997	\$200.00
William G. or Tina Johnson	7/16/1997	\$800.00
Den James Kail	7/23/1997	\$5,500.00
Kevin J. Keller	6/6/1997	\$1,500.00
Harvey & Emma Krieger	5/12/1997	\$2,000.00
Harvey & Emma Krieger	9/30/1997	\$2,500.00
Harvey Krieger	5/12/1997	\$500.00
Peggy Krieger	9/30/1997	\$125.00
Perry Krieger	5/12/1997	\$125.00
Linda J. Kunzler and Shelle M. Court	7/22/1997	\$500.00
Ernesto Alonzo Langerica	7/24/1997	\$500.00
Judy S. and Felipe J. Langerica	7/24/1997	\$1,000.00
Juaquin L. or Isabel G. Langerica	7/23/1997	\$1,100.00
Richard K. or Isabel Langerica	7/23/1997	\$1,000.00
Ed Lindbloom	6/4/1997	\$500.00
Kenneth D. or Monica A. Lindbloom	8/5/1997	\$300.00
Allan U. or Sharon B. Lloyd	7/11/1997	\$5,000.00
Jason B. Lloyd	7/21/1997	\$100.00
Dean L. or Kathy Loveland	7/6/1997	\$500.00
Dean L. Loveland or Nancy Black	7/8/1997	\$500.00
Gary W. or Donna J. Loveland	7/17/1997	\$500.00
Gary W. or Donna J. Loveland	7/17/1997	\$500.00
Gary W. or Donna J. Loveland	7/17/1997	\$500.00
Gary W. or Donna J. Loveland	7/17/1997	\$500.00
J. C. Loveland or Dean T. Loveland	7/8/1997	\$2,000.00
Lynn Loveland	7/5/1997	\$5,000.00
Lynn H. Loveland	Unknown	\$2,000.00
Paul Allan or Sherlyn Lloyd	7/29/1979	\$2,000.00
Johnna Lund	5/12/1997	\$125.00
Johnna Lund	9/30/1997	\$125.00
Jan K. or Christian Machidon	7/9/1997	\$500.00



David G. and Jennifer W. Macy	7/22/1997	\$450.00
Darin G. or Lorrie C. Maughan	6/27/1997	\$1,050.00
Charlene McCoy, re-issued	7/10/1997	\$0.00
Charlene McCoy, re-issued	7/10/1997	\$0.00
Brian J. Morgan	7/11/1997	\$2,500.00
Bruce & Leah Morgan	5/12/1997	\$5,000.00
Bruce L. Morgan Sr. or Leah Morgan	7/7/1997	\$15,000.00
Bruce L. or Laura A. Morgan	7/7/1997	\$2,000.00
Dennis J. Morgan	8/6/1997	\$10,000.00
Karen M. Morgan	7/7/1997	\$500.10
Susy Morris	5/12/1997	\$125.00
Susy Morris	9/30/1997	\$125.00
John or Mary Mussotto	7/1/1997	\$1,000.00
John or Mary Mussotto	7/22/1997	\$500.00
John or Mary Mussotto	7/22/1997	\$500.00
Nat & Francis Mussotto	7/5/1997	\$500.00
Robert P. or Linda D. Olzack	7/23/1997	\$5,000.00
Brian and Sharla Phelps	7/11/1997	\$2,000.00
Scott M. Rabino	7/7/1997	\$500.10
Robert and Aurora Rivas	7/16/1997	\$1,000.00
Robert and Aurora Rivas	7/16/1997	\$1,000.00
Robert and Martha E. Rivas	7/20/1997	\$1,000.00
Boyd C. Robbins	5/23/1997	\$500.00
Boyd C. Robbins	6/16/1997	\$500.00
James H. & Judith Robbins	5/23/1997	\$1,000.00
James H. & Judith Robbins	6/16/1997	\$500.00
James H. & Judith Robbins	6/16/1997	\$500.00
James H. & Judith Robbins	6/16/1997	\$500.00
Steven J. & Linda J. Robbins	5/23/1997	\$1,000.00
Julie L. Rosdahl	7/29/1997	\$1,500.00
Sue Banks Sapp	7/29/1997	\$100.00
Susan L. Sheffer	7/24/1979	\$1,000.00
Donald Shull	7/24/1997	\$1,000.00
Mark D. Shull	6/30/1997	\$100.00
Stephanie V. Shull	5/19/1997	\$100.00
Stephanie V. Shull	6/26/1997	\$100.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
Glenn A. & Noreen M. Shute Family Trust	7/28/1997	\$1,500.00
David Sondoal	7/17/1997	\$1,500.00
Julie B. or Toby M. Studer	7/10/1997	\$1,000.00
Myrna J. or Ivan I Taylor	6/30/1997	\$750.00
Myrna J. or Ivan I Taylor	6/30/1997	\$750.00
Myrna J. or Ivan I Taylor	7/9/1997	\$750.00

Michael Trask and Ann Gooding	7/17/1997	\$500.00
Michael Trask and Ann Gooding	7/17/1997	\$500.00
Michael Trask and Ann Gooding	7/17/1997	\$500.00
Michael Trask and Ann Gooding	7/17/1997	\$500.00
Michael Trask and Ann Gooding	7/17/1997	\$500.00
Linda C. & Logan E. Williams	5/7/1997	\$500.00
Logan E. or Linda C. Williams	6/25/1997	\$1,500.00
Christopher Wright	7/11/1997	\$2,500.00
Zephyr International Limited	Unknown	Unknown
Totals		\$217,815.20